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7 Corporation, Jay Abbe, Jozef Straus, and Anthony
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

12 In re JDS UNIPHASE CORPORATION
SECURITIES LITIGATION

Master File No. C-02-1486 CW (EDL)

This Document Relates To: All Actions

**STIPULATION AND [PROPOSED]
ORDER RE DEFENDANTS' MOTION
TO COMPEL**

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STIPULATION & [PROPOSED] ORDER RE
DEFS.' MOT. TO COMPEL
Case No. C-02-1486 CW
sf-1969287

1 WHEREAS Defendants JDS Uniphase Corporation, Jay Abbe, Jozef Straus, and Anthony
2 Muller (the "JDSU Defendants") intend to move to compel Lead Plaintiff to produce its fee
3 agreement with counsel;

4 WHEREAS the parties have met and conferred about this matter;

5 WHEREAS the parties wish to resolve this matter promptly; and

6 WHEREAS the parties have agreed to request a shortened schedule for presenting this
7 matter to the Court;

8 IT IS HEREBY STIPULATED by and between the parties to this action, through their
9 counsel of record, as follows:

10 1. The parties request the following briefing schedule for the JDSU Defendants'
11 contemplated motion:

- 12 • Both parties shall simultaneously submit ten-page letter briefs to the Court on
13 August 2, 2005; and
14 • Neither party shall submit any additional briefs.

15 2. The parties request that the Court hear the JDSU Defendants' motion at the same
16 time that it will hear Plaintiff's motion to compel on August 16, 2005.

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18 Dated: July 25, 2005

MORRISON & FOERSTER LLP

20 By: /s/ Philip T. Besirof
21 Philip T. Besirof

22 Attorneys for JDSU Defendants

1 Dated: July 25, 2005
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GOODKIND LABATON RUOFF &
SUCHAROW LLP
Attorneys for Lead Plaintiff,

4 and
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6

BERMAN DEVALERIO PEASE TABACCO
BURT & PUCILLO,
7 Liaison Counsel for Lead Plaintiff
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10 By: /s/ Lisa Buckser-Schulz
11 Lisa Buckser-Schulz
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14 Attorneys for Lead Plaintiff
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I, Philip Besirof, am the ECF User whose ID and password are being used to file this
12 Stipulation And [Proposed] Order Re Defendants' Motion To Compel. In compliance with
13 General Order 45, X.B., I hereby attest that Lisa Buckser-Schulz, attorney for Lead Plaintiff, has
14 concurred in this filing.
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Dated: July 25, 2005

MORRISON & FOERSTER LLP

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18 By: /s/ Philip T. Besirof
19 Philip T. Besirof
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22 Attorneys for JDSU Defendants
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1 [PROPOSED] ORDER
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3 Pursuant to stipulation, IT IS SO ORDERED.
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7 ELIZABETH D. LAPORTE
8 United States Magistrate Judge
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